Revised 02/03

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# STATE OF COLORADO


Bill Owens, Governor
Douglas H Benevento, Executive Director

*Dedicated to protecting and improving the health and environment of the people of Colorado*

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Colorado Department
of Public Health
and Environment


| DIST | LTR | ENC |
|---|---|---|
| BERARDINI, J. H. | X | X |
| BOGNAR, E. S. | X | X |
| CROCKETT, G. A. | | |
| DECK, C. A. | | |
| DEGENHART, K. R. | | |
| DIETER, T. J. | | |
| DIETERLE, S. E. | X | X |
| FERRERA, D. W | X | X |
| FERRI, M. S. | | |
| GERMAIN, A. L. | | |
| GIACOMINI, J. J. | | |
| ISOM, J. H. | | |
| LINDSAY, D. C. | | |
| LONG, J. W | | |
| LYLE, J. L. | | |
| MARTINEZ, L. A | X | X |
| NAGEL, R. E | X | X |
| NORTH, K. | | |
| PARKER, A. M. | | |
| POWERS, K. P | | |
| RODGERS, A. D. | | |
| SHELTON, D. C. | X | X |
| SPEARS, M. S | | |
| TRICE, K. D. | | |
| TUOR, N. R. | | |
| WILLIAMS, J. L. | | |
| BUTLER, L. | X | X |

| | | |
|---|---|---|
| COR. CONTROL | X | X |
| ADMN. RECORD | X | X |
| PATS/130 | | |

June 3, 2003

Richard J DiSalvo
Acting Assistant Manager for Environment and Stewardship
U S Department of Energy
Rocky Flats Field Office
10808 Highway 93, Unit A
Golden, Colorado 80403-8200

**RE: Approval, Industrial Area Sampling and Analysis Plan FY03 Addendum #IA-03-06, IHSS Group 400-3 (B444/447), April 2003**

Dear Mr DiSalvo

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the Division) has considered the manner in which revisions will be made to the subject document A comment resolution meeting on May 29, 2003 was successful in resolving the Division's comments, which are attached for reference. Based on this approval, please re-issue the report for verification and completion

As reaffirmed at the meeting, the consultative process will be utilized to adjust the location and depths of biased sampling locations inside Buildings 444 and 447

If you have any questions regarding this approval, please contact me at (303) 692-3367, Harlen Amscough at 303-692-3337 or David Kruchek at 303-692-3328

Sincerely,

Steven H Gunderson
RFCA Project Coordinator

Attachment

cc Norma Castaneda, DOE
Tim Rehder, EPA
Lane Butler, KH
~~Dave Shelton, KH~~
Mark Sattelberg, U S F&W
Administrative Records Building T130G

Reviewed for Addressee
Corres Control RFP

6/9/03 Date lbg By

Ref Ltr #

DOE ORDER #
5400.1

DOCUMENT CLASSIFICATION
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JUN 2003
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H \RFETS\400-3 IHSS Group SAP Addendum (B444-447) #IA 03-06 App doc

ADMIN RECORD

IA-A-001454

**Colorado Department of Public Health and Environment**

**Hazardous Materials & Waste Management Division**

**Comments**

**Draft Industrial Area**

**Sampling and Analysis Plan**

**FY 03 Addendum #IA-03-06**

**IHSS Group 400-3**

**April 2003**

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**General Comments:**

1 The Division has identified information from the HRR, 1992, and not described in Appendix C of the IASAP, that may warrant additions to the SAP Addendum These are described in the specific comments

**Specific Comments:**

2. Section 1 2, page 2, 3rd para , 4th sent - Please replace "UBC" with "buildings " The Division understands the context, but as written it is implied that the sampling will occur "beneath" an existing contaminated layer

3. Item 1 - Consistent with Comment No 2, please replace "at UBCs" with "beneath the buildings "

4. last para , The rationale for the 72-meter grid does not appear to include the current conditions that indicate that soil contamination exists under the buildings The fact that groundwater from the foundation drain system has been connected to the process waste lines and has historically gone to B371 for treatment and is currently collected and sent to B891 for treatment due to contamination above levels of concern (primarily due to excessive Be levels) must be included in this discussion Since the groundwater is contaminated, there is most likely a source in the soil under the building (possibly from previous fires in the building) This then requires sufficient investigation to properly identify the source or sources of this contamination Please provide a proper discussion of this issue in relation to the rationale for the expanded grid as proposed, or utilize the appropriate grid as identified in the IASAP There must also be sufficient biased sampling to properly investigate the various specific concerns as currently identified as well as possible additional concerns associated with other possible sources or pathways of UBC, as discussed in other comments

5. Figure 1 - Please distinguish Tanks 4, 5 and 6 as included in Table 1 and add the information to the "Key" Also, show the locations of OPWL leaks P-5-1 and P-5-2 as discussed in Section 2 2

6 The sites as identified on Fig 5 as P 5-1 & 5-2 should be shown on Fig 1

7. Section 2 1 - This section indicates that previous sampling has not detected any metals at levels that warranted placement on the figures However, previous sampling of the soil has found metals above levels of concern, especially around the east dock As such, this should have been identified and properly included, see Nick Demos

8 Section 2.2 – In comparing the location of the 000-121 OPWL tanks on Figure 1 to the proposed locations on Figure 4, it does not appear that sampling locations for the OPWL tanks are shown on Figure 4 and are,



2

accordingly, not included in Table 3 Table 3 must show sampling depths constituent with site conditions and within potential soil removal limits for UBC Please address

9. Section 2 2 - It is stated that all of the sampling locations for the various IHSSs and PACs are shown on either Fig 4 or 5 and identified in Table 4 However, in comparing the location of the 000-121 OPWL tanks on Figure 1 to the proposed locations on Figure 4 there do not appear to be any samples identified for 000-121 as shown on Figure 1 associated with "Tank 4-OPWL Process Waste Pits", "Tanks 5-OPWL Process Waste Tanks", or "Tanks 6-Process Waste Floor Sump and Foundation Drain Floor" Accordingly, they are not included in Table 3 Table 3 must show sampling depths constituent with site conditions and within potential soil removal limits for UBC Therefore, either provide these sample locations and drilling specifications or provide an appropriate explanation for why samples are not being collected for these specific sites

10 **Figure 2** - Each occurrence of Di-N-Butylphate, in the upper portion of the map, incorrectly show Plutonium 239/240 Wrw action levels of 50/116 A "pencil" correction would be acceptable

11. **Table 2** – For IHSS 400-116 2, the IASAP, Appendix C, and HRR indicate that "radioactive solvents" may have been stored on the dock It is appropriate to add VOCs to Table 2 and to incorporate sampling to a sufficient depth in Table 3 Are the biased samples located at the drains?

12. For IHSS 400-136 2, the IASAP, Appendix C, references the HRR as indicating that an oily sheen was observed on the water surface of pond It is appropriate to add VOCs to Table 2 and to incorporate sampling to a sufficient depth in Table 3 Should acid be included as a PCOC for this IHSS?

13. For IHSS 400-136.2 the HRR suggests that a small amount of depleted uranium may have been buried at the site. Although not stated in the HRR, the note seems to suggest that the burial occurred after the pond had dried up Please try to determine if a typical depth for blowdown ponds existed, then attempt to locate and drill, as a starting point, within the center of the pond

14. Should acid be included as a PCOC for or IHSS 400-207 & 400-208?

15. For IHSS 000-121, why isn't there any information presented for the known OPWL leaks yet sampling only provided for this site in Table 3? VOCs need to be added for all samples collected associated with 000-121 In addition all samples collected for this Group should include at a minimum lab analysis for VOCs, Be, and U

16. **Table 3.** When sampling under concrete or asphalt VOC samples should be taken in the 0 – 0 5' depth when fine-grained materials are present, i e Sand, or soil If VOC's are present, deeper samples will be needed Please address this in the text supporting this table Since the addendum indicates that existing data for the tanks was not found, it appears appropriate to add VOCs to the analyte list Please address

17. Please correct the analytical method numbers shown in the Offsite Laboratory Method column for all affected pages. Please note the Excel program was performing a running count, i e 8082, 8083, 6010, 6011, etc especially in the latter pages Others do not correspond to method numbers, i e 9356.5, 10233 7, etc

18 Unlike Appendix C of the IASAP, the HRR, 1992, indicates that "chlorinated hydrocarbons solvents used to rinse beryllium parts were dumped on the ground outside Room 106 which opens to the dock" Please verify whether the sampling locations currently planned cover the reported site and add sample locations if necessary

19 Likewise, the HRR indicates that an adjacent areaway was the pit entrance to the basement of Building 444 The pit, relative to an incident with a fire in a portable vacuum, had not been cleaned when the HRR reference was written It appears that the pit needs to be located and added to the SAP addendum It

3

appears from Figure 5 that, the proposed sampling may be limited to the area beneath the dock. Please clarify or address

20. The Division also is concerned whether the downwind area from the dock, relative to lids being blown off drums, will be adequately sampled for uranium contamination It appears from Figure 5 that, the proposed sampling may be limited to the area beneath the dock. Please clarify or address

21. Table 4 - Why aren't there any locations for the other 000-121 sites other than for the known OPWL leaks?

22 Please provide the rationale for all of the biased locations.

23 Figure 4 - At a minimum, the locations of inground/underbuilding drains and lines (including the foundation drains and process waste lines), as well as other significant infrastructure, such as the basement, pits, tanks, and sumps need to be identified, with specific sample locations for these identified in the Tables as well as on the figure.